

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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INA STEINER, DAVID STEINER, and  
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., et al.,

Defendants.

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) Case No. 1:21-CV-11181-PBS  
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**UNOPPOSED MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF  
DEFENDANT STEVE WYMER'S MOTION TO VACATE GOVERNMENT'S  
PROTECTIVE ORDER**

Pursuant to Local Rule 7.1(b)(3), Defendant Steve Wymer respectfully requests that the Court grant him leave to file a 10-page reply brief in support of his Motion to Vacate the Government's Protective Order and in response to the Government's Opposition filed on April 23, 2025. (ECF No. 631.) In support, Wymer states as follows:

1. On April 9, 2025, Wymer filed his Motion to Vacate the Government's Protective Order. (ECF No. 622.)

2. That same day, Defendants Devin Wenig and Wendy Jones filed joinders to Wymer's Motion. (ECF Nos. 624, 625.)

3. On April 23, 2025, the Government filed its Opposition to the Motion, which asserts various arguments related to relevance, burden, and the state secrets privilege. (ECF No. 631.)

4. Wymer's Motion and the Government's Opposition raise important issues about whether and the extent to which the parties will be permitted to take discovery and, in the event of any trial, introduce evidence about Baugh that Wymer considers to be central to his defense.

5. Wymer believes that the submission of the reply brief will aid the Court in resolving the important issues presented in the Motion.

6. Wymer seeks leave to file a reply brief of no more than 10 pages to respond to the arguments the Government has raised.

7. Wymer further requests leave to file that reply on or before May 5, 2025.

8. Counsel for Wymer has conferred with the Government's counsel regarding Wymer's intent to move for leave to file a reply. In response, the Government's counsel stated that the Government does not oppose Wymer's motion for leave to file a reply. Counsel for Wymer also emailed all parties asking for their position. PFC's counsel indicated that PFC does not object to Wymer's motion, and no other party articulated any objection.

WHEREFORE, Wymer respectfully requests leave to file a 10-page reply brief on or before May 5, 2025.

Respectfully submitted,

STEVE WYMER,

By his Attorneys,

s/ Caz Hashemi

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Dated: April 30, 2025

**CERTIFICATION PURSUANT TO L.R. 7.1(a)(2)**

I hereby certify on April 30, 2025, that counsel for Defendant Steve Wymer, in accordance with Local Rule 7.1(a)(2), has conferred with counsel for the other parties, as well as with *pro se* parties. PFC's counsel stated that PFC does not object. The remaining parties did not articulate any objection.

/s/ Caz Hashemi  
Caz Hashemi

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Caz Hashemi  
Caz Hashemi